



Memorandum

Date: August 11, 1999

To: CALFED Policy Group

From: Lester A. Snow
Executive Director

Subject: North Delta Conveyance Issues

As you may be aware, members of the environmental community have raised concerns about the description of the North Delta conveyance actions contained in the June 1999 Phase II Report (See Attachment 1, press clips). It is unfortunate that these concerns arise in an accusatory way rather than in an effort to clarify. I thought it may be useful to review the development of June 1999 North Delta description.

1. March 1998 Phase II Interim Report. The report was part of the EIR/S which provided a description of the three alternatives without identifying a preferred program alternative. Alternative 2 (Modified Through Delta Conveyance) provided for a 10,000 cfs screened diversion at Hood with a canal to the Mokelumne River. (See Attachment 2, March 1998 Phase II Interim Report, pp. 93-97). While this alternative had various strengths and weaknesses, a major problem was the potential effects on fisheries from operation of the 10,000 cfs Hood-Mokelumne diversion. Subsequent to the hearing and comment period, CALFED began optimizing a through-delta conveyance strategy and asked the Diversion Effects on Fisheries Team (DEFT) to develop fisheries strategies as part of the through Delta strategy (this effort evolved into the Environmental Water Account (EWA) work group). As the fisheries evaluations progressed through the summer and fall of 1998, it became clear that some actions (especially closing the Delta Cross Channel) while providing fishery benefits resulted in lower water quality in Central and South Delta. In an effort to offset this water quality impact, consideration was given to a much smaller Hood-Mokelumne screened diversion.
2. December 18, 1998 Revised Phase II Report. At the time of the release of the revised report there was sufficient concern over water quality degradation that a specific conveyance contingency action was added (See Attachment 3, December 1998 Revised Phase II Report).

CALFED Agencies

California The Resources Agency
Department of Fish and Game
Department of Water Resources
California Environmental Protection Agency
State Water Resources Control Board
Department of Food and Agriculture

Federal Environmental Protection Agency
Department of the Interior
Fish and Wildlife Service
Bureau of Reclamation
U.S. Geological Survey
Bureau of Land Management
U.S. Army Corps of Engineers

Department of Agriculture
Natural Resources Conservation Service
U.S. Forest Service
Department of Commerce
National Marine Fisheries Service
Western Area Power Administration

The descriptions on pages 89 and 110 established the evaluation of a 2000 cfs diversion as a water quality mitigation if fisheries protection can be maintained or improved. Item 11 on page 111 indicates that actions would be initiated based on the outcome of the evaluation. Even at that time it was recognized that the fisheries concerns may be insurmountable and that other water quality measures may be more feasible. Subsequent to the December report additional modeling and evaluation of cross channel closures, EWA operations and water quality were conducted resulting in refinement of the North Delta contingency strategy.

3. June 1999 Revised Phase II Report. (See Attachment 4) The June report picked up the strategy refinements but stayed with the December policy structure by providing that, "A screened diversion at Hood will be evaluated and may be implemented if necessary." The required action is the evaluation not implementation. Item 3 on page 130 goes on to describe the nature of the evaluation and the conditions which must be met. The evaluation must confirm a water quality problem, and show that a 0-4000 cfs diversion can address the problem without impact on fish. Only then can consideration be given to a pilot project and only after operation of a pilot facility can consideration be given to a production facility. What is missing from the report is a clear description of the sequence of decisions and the decision process. Subsequent to the public comment period, consideration should be given to rewriting this section to more clearly convey its contingent nature and significant conditions for feasibility.

In conclusion, CALFED's fundamental policy position regarding the through-Delta Strategy, and specifically the North Delta portion of it, have not changed since last fall.

Attachments